

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

PETER DELVECCHIA, <i>et al.</i> ,	)	<b>Case No: 2:19-CV-01322-KJD-DJA</b>
	)	
Plaintiffs,	)	<b>PLAINTIFFS' SUPPLEMENTAL</b>
	)	<b>MOTION FOR SANCTIONS</b>
vs.	)	<b>AGAINST DEFENDANT</b>
	)	<b>FRONTIER AIRLINES, INC.</b>
	)	
FRONTIER AIRLINES, INC., <i>et al.</i> ,	)	<b><u>EXHIBIT B</u></b>
	)	
Defendants.	)	
	)	

---

**Defendant Frontier's Third Amended Privilege Log Served on October 29, 2021**

# EXHIBIT A

**Privilege Log of Frontier Airlines in the Matter of *Delvecchia, et al. v. Frontier Airlines, Inc., et al.***

Bates No.	Document Type	Date	Author	Recipient	Subject Matter	Privilege
N/A	Memo	8/8/19	Frontier's counsel	N/A	Impressions of Frontier's counsel's telephone conversation with passengers Brianna Hayes and Rashaad Wormack (seats 17B/17C) on August 8, 2019.	Attorney Work Product
N/A	Memo	4/1/21	Frontier's counsel	N/A	Impressions of Frontier's counsel's telephone conference with passenger Christopher Higgins on April 1, 2021.	Attorney Work Product
N/A	Memo	5/7/21	Frontier's counsel	N/A	Impressions of Frontier's counsel's telephone conference with passenger Christopher Higgins on May 7, 2021.	Attorney Work Product
Frontier 2110-2112	Frontier RNT Record	1/7/20, 11/19/19, 11/2/19, 10/4/19, 10/3/19	Frontier's counsel	Joy Jenkins, Sr. Manager, Disabilities and Escalations at Frontier Airlines	Communications related to preparing responses and compiling documents in response to Plaintiffs' Discovery Requests.	Attorney-Client Privilege and Attorney Work Product.
Frontier 2091-2109	Frontier RNT Record	7/27/21, 6/25/21, 6/22/21, 6/10/20, 1/7/20, 11/19/19, 10/4/19, 10/3/19, 4/18/19	Frontier's counsel	Joy Jenkins, Sr. Manager, Disabilities and Escalations at Frontier Airlines	Communications related to preparing responses and compiling documents in response to Plaintiffs' Discovery Requests.	Attorney-Client Privilege and Attorney Work Product.